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Subchapter V Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:)	
)	
SKIN LOGIC, LLC)	
)	Case No. 23-11352-KHK
)	Chapter 11
Debtor)	

**SUBCHAPTER V TRUSTEE’S MOTION TO APPROVE ADDENDUM TO
MARKETING AGREEMENT WITH MARK IRION AND TRANSWORLD
BUSINESS ADVISORS OF RICHMOND VA AS BROKER TO THE ESTATE**

Stephen A. Metz, Subchapter V Trustee (the “Trustee”) for Skin Logic, LLC (the “Debtor”), hereby moves this Court pursuant to Section 327(a) of Title 11 of the United States Code, for entry of an order authorizing the Trustee to execute Addendum to Marketing Agreement with Mark Irion and Transworld Business Advisors of Richmond VA as his broker (the “Motion”), and in support thereof states:

Jurisdiction

1. This Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue of this case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

The Chapter 11 Case

2. On August 24, 2023 (the “Petition Date”), the Debtor filed its voluntary petition for relief under Chapter 11, Subchapter V, of the Bankruptcy Code.

3. On September 27, 2023, the Court entered an Order Granting the Acting United States Trustee's Motion to Remove Debtor as Debtor in Possession and to Appoint Subchapter V Trustee as Operating Trustee Pursuant to 11 U.S.C. § 1185(a).

Relief Requested

4. On December 28, 2023, the Trustee filed Subchapter V Trustee's Application for Authority to Employ Mark Irion and Transworld Business Advisors of Richmond as Broker to the Estate [Doc. 79] (the "Application to Employ Broker"). On January 2, 2024, the Court entered an Order Authorizing Employment of Mark Irion and Transworld Business Advisors of Richmond VA as Broker to the Estate [Doc. 80] (the "Broker Employment Order.")

5. The Application to Employ Broker was based upon a Marketing Agreement, a copy of which is attached hereto as **Exhibit 1** (the "Marketing Agreement"). The Marketing Agreement was for a term of six (6) months beginning January 2, 2024.

6. As explained to the Court at various recent hearings, Mark Irion and Transworld Business Advisors of Richmond VA ("Transworld") have continued to market the Debtor's assets for sale. Transworld has continued to assist the Trustee in negotiations with several potential buyers, including the buyer who is the subject of a pending sale motion filed on November 15, 2024. Transworld and the Trustee recently spoke to another potential purchaser who may be willing to make a better offer.

7. The Trustee wishes to execute the Addendum to Marketing Agreement attached hereto as **Exhibit 2** (the "Addendum"), which extends the term to the sooner of February 21, 2024 or whenever the Trustee may cease to be the court appointed Subchapter V trustee without authority to sell the Debtor's assets.

8. The marketing process has taken longer than expected, but in any event, Transworld has continued to play a vital role throughout the process. According, it is in the best interest of the Debtor's Estate to authorize the Trustee to execute the Addendum.

WHEREFORE, the Trustee respectfully requests that the Court enter an order authorizing the Trustee to execute the Addendum and grant such other and further relief as is just and proper.

Respectfully submitted,

OFFIT KURMAN, P.A.

By: /s/ Stephen A. Metz
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Subchapter V Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of December, 2024, a copy of this Motion and proposed order was served via CM/ECF on all registered ECF participants who have appeared in this case.

/s/ Stephen A. Metz
Stephen A. Metz

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